

# **EXHIBIT 120**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

1 Pursuant to 28 U.S.C. Sec. 1746(2), I, Luis Cortes Romero, hereby declare as follows:

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- 3 1. I am over the age of eighteen and competent to testify.
- 4 2. I am a licensed lawyer eligible to practice law. I am licensed in the State of California.
- 5 My license number is CSB #310852. I practice exclusively in federal law in the state
- 6 of Washington. We have offices located in Kent, Washington and Kennewick,
- 7 Washington.
- 8 3. I am the managing attorney at Barrera Legal Group, PLLC ("Barrera Legal") for its
- 9 Washington offices. I am responsible for managing the firm's overall administrative
- 10 functions, as well as oversee the immigration cases handled by the Washington offices.
- 11 I also am in charge of hiring staff for the Washington offices.
- 12 4. Barrera Legal is a small business with less than 15 employees between the two
- 13 Washington offices. At least 5 of our staff members are beneficiaries of Deferred
- 14 Action under the Deferred Action for Childhood Arrivals ("DACA") program. These
- 15 staff members are located in both our Kennewick and Kent offices. These staff
- 16 members work in a wide range of highly technical and extremely confidential
- 17 capacities as they often help in case preparation for victims of domestic violence,
- 18 human trafficking, and sexual assault. If these staff members lose their status and are
- 19 removed from the United States, Barrera Legal, and the vulnerable and marginalized
- 20 clients it represents will suffer significant loss.
- 21 5. Barrera Legal has always been committed to equal rights, diversity and advocating for
- 22 those from marginalized communities. As Barrera Legal has grown, we have worked
- 23 diligently to attract only the most qualified and talented people from all over the United
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DECLARATION OF LUIS CORTES ROMERO

1 States, and believe this is one of the things that makes Barrera Legal stand out – a  
2 diverse staff that can utilize its cultural capital to better help and understand our clients.  
3 6. Moreover, as an immigration lawyer, I have helped several DACA beneficiaries either  
4 renew their DACA benefit, or apply for it for the first time. A significant number of  
5 these clients work with small business throughout the state of Washington. A common  
6 concern amongst my DACA clients the expiration of their work authorization, and the  
7 sudden loss of their employment. By the same token, I am often contact by concerned  
8 small business owners from Washington asking what the business can do for their  
9 DACA beneficiary employee so that the employee's work permit can continued to be  
10 renewed, so that they do not lose a valuable employee.  
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14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on this 23<sup>rd</sup> day of September, 2017

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19 Luis Cortes Romero  
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DECLARATION OF LUIS CORTES ROMERO